## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

COACH, INC. and	§	
COACH SERVICES, INC.,	§	
	§	
Plaintiffs	§	
	§	
VS.	§	
	§	CV-NO: 4:16-cv-3150
TRENDY TEXAS, LLC, BAIG	§	
MAHMOOD, AN INDIVIDUAL AND	§	
MIRZA MOHAMMAD DAWOOD BAIG,	§	
	§	
Defendants.	§	

## DECLARATION OF JOHN R. NELSON IN SUPPORT OF PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION

I, John R. Nelson, declare as follows:

- 1. I am over the age of eighteen (18), have not been convicted of a felony, and am otherwise qualified to offer this declaration.
- 2. I am a partner with the law firm of Locke Lord LLP and a member in good standing of the State Bar of Texas and am admitted to practice before this Court. Locke Lord LLP represents Plaintiffs in the above-captioned matter. As the attorney at Locke Lord LLP with primary responsibility for this case, I have personal knowledge of the matters set forth below.
- 3. Plaintiffs filed their First Amended Complaint on April 12, 2017 against defendants Trendy Texas, LLC, Baig Mohammad, an individual, and Mirza Mohammad Dawood Baig, an individual. The First Amended Complaint alleged that Trendy Texas, LLC unlawfully duplicated, copied, distributed, imported, manufactured, exhibited and/or sold infringing purportedly Coach branded products.

4. Trendy Texas, LLC was served with the Summons and Amended Complaint on May 10, 2017.

5. Upon information and belief, Trendy Texas, LLC is a Texas limited liability

corporation and therefore is not currently on active duty in the United States military.

6. I am informed and believe that Defendant Trendy Texas, LLC ("Trendy Texas")

does business in Texas, is not an infant or incompetent person, or protected by the Soldiers' and

Sailors' Civil Relief Act of 1940.

7. To date, Defendant Trendy Texas, LLC has not pled in response to or otherwise

defended against the First Amended Complaint, despite the passage of more than twenty (20)

days since service. For this reason, Plaintiffs respectfully request, pursuant to Rule 55(a) of the

Federal Rules of Civil Procedure, that the Court enter the default of Defendant Trendy Texas,

LLC.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury under the laws of the

United States of America that the foregoing is true and correct.

John R. Nelson

STATE OF TEXAS

§

COUNTY OF TRAVIS

§

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned notary public, on this

Notary Public in and for

the State of Texas

